



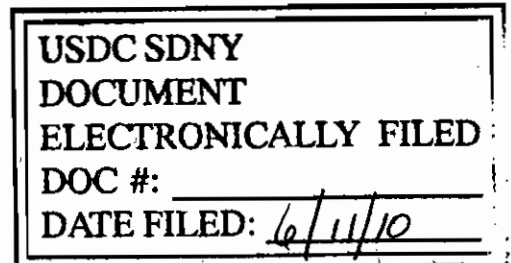
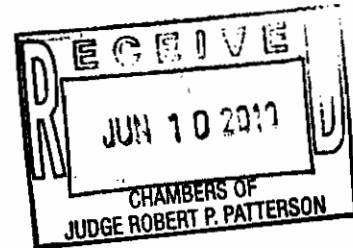
MEMO ENDORSED

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June 10, 2010

BY FACSIMILE

The Honorable Robert P. Patterson
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312



Re: Sloane v. Kraus, Index No. 06-Civ.-5372 (RPP)

Dear Judge Patterson:

I am the pro bono attorney for plaintiff Derek Sloane in the above referenced matter. I respectfully submit this letter to request that Your Honor approve the attached writ ordering that Mr. Sloane, who is incarcerated at Great Meadow Correctional Facility, be moved to the Metropolitan Correctional Center (MCC) to remain there through the conclusion of the trial in this action. The reason for this request is that Great Meadow is several hours from my office in Manhattan, and it consequently is difficult, as well as costly to my law firm, for me to travel to meet with Mr. Sloane to prepare him for trial. It is not possible for me to prepare Mr. Sloane for trial by phone because, absent a court order, Great Meadow limits attorney phone calls with inmates to ten minutes per call.

If for any reason Your Honor determines that it is not proper for Mr. Sloane to be moved to MCC at this time, then I respectfully request in the alternative that Your Honor by endorsement of this letter instruct the Superintendent of Great Meadow to permit me to conduct phone calls of unlimited duration with Mr. Sloane.

Respectfully submitted,

Eric Epstein
Eric B. Epstein

Application Denied without prejudice. If the parties confer and set a trial date acceptable to the Court, the Court will have the plaintiff brought to the MCC for a period of time sufficient to prepare for trial.
cc: Fay Angela Jones, Esq. (by facsimile)
An open ended application will not be approved however, in ruling the crowded conditions at the MCC.

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SEE ATTACHED TYPEWRITTEN
MEMO ENDORSEMENT

6/10/10

Case: Derek Sloane v. Westchester County Police
Index No. 06 Civ. 5372 (RPP)

MEMO ENDORSEMENT READS:

Application denied without prejudice.

If the parties confer and set a trial date acceptable to the Court, the Court will have the Plaintiff brought to the MCC for a period of time sufficient to prepare for trial. An open ended application will not be approved forever, in view of the crowded conditions at the MCC.

So Ordered.

Robert P. Patterson, Jr., U.S.D.J., 6/10/10